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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VINCENT A. GORMAN, JR.

Plaintiff,

vs.

WACHOVIA CORPORATION and
WACHOVIA SECURITIES, LLC,

Defendants.

Civil Action No. 08-civ-7409

**STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME TO
ANSWER OR OTHERWISE MOVE
WITH RESPECT TO PLAINTIFF'S
COMPLAINT**

The parties, through their undersigned counsel, hereby stipulate and agree as follows:


1. Plaintiff filed his Complaint on July 11, 2008 in the Supreme Court of the State of New York, Westchester County.
2. Defendant Wachovia Securities, LLC was served with a copy of the Complaint on July 23, 2008.
3. Defendant Wachovia Corporation was served with the Complaint on July 25, 2008.
4. On August 21, 2008, Defendants filed a Notice of Removal on behalf of Defendants Wachovia Corporation and Wachovia Securities, LLC.
5. The original date by which Defendants were to file their original Answer or otherwise move was August 24, 2008 and Defendants have not previously requested any extension of time with respect to filing pleadings in this action.

6. Plaintiff and Defendants stipulate and agree that the time by which Defendants must answer or otherwise move with respect to the Complaint be extended.

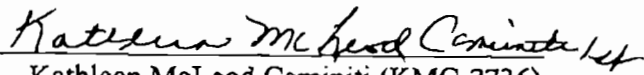
7. Plaintiff and Defendants stipulate and agree that the time by which Defendants must answer or otherwise move with respect to the Complaint be extended through and including September 12, 2008. The parties agree that the time for plaintiff to make a motion pursuant to 28 U.S.C.A. 1447 shall be extended to run from the September 12, 2008 .

8. This Stipulation shall be filed electronically, may be signed in counterparts and facsimile signatures to this Stipulation shall be deemed as originals.

Dated: August 26, 2008

By: 
Anthony Pirrotti, Jr., Esq.


For the Firm
Attorneys for Plaintiff
Pirrotti Law Firm LLC
2 Overhill Road, Ste. 200
Scarsdale, NY 10583
Phone: (914) 723-4333

By: 
Kathleen McLod Caminiti (KMC-2736)

Of Counsel for the Firm
Attorneys for Defendants
Fisher & Phillips LLP
430 Mountain Avenue
Murray Hill, New Jersey 07974
Phone: (908) 516-1050
E-mail: kcaminiti@laborlawyers.com

ORDER

SO ORDERED this 28th day of August 2008 that the time by which Defendants must answer or otherwise move with respect to the Complaint is hereby extended until September 12, 2008.



HONORABLE KENNETH M. KARAS, U.S.D.J.